

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND
(Baltimore Division)

In re)	
)	
TERESA P. JOHNSON,)	Case No. 10-23633-NVA
)	(Chapter 11)
<u>Debtor.</u>)	
BSI FINANCIAL SERVICES,)	
)	
Movant,)	
)	
v.)	
)	
TERESA P. JOHNSON,)	
)	
Respondent.)	

OPPOSITION TO AMENDED MOTION FOR RELIEF FROM AUTOMATIC STAY

Debtor Teresa P. Johnson (“Debtor”), by her attorney, James C. Olson, opposes the Amended Motion for Relief from Automatic Stay on Real Property Located at 3604 Cameron Court, Ellicott City, MD 21042 (the “Motion”), filed by BSI Financial Services (“Movant”), and answers the allegations of the Motion as follows:

1. Admits the allegations contained in paragraph 1 of the Motion.
2. Admits the allegations contained in paragraph 2 of the Motion.
3. Admits the allegations contained in paragraph 3 of the Motion.
4. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 4 of the Motion, but admits the authenticity of the Note attached as an exhibit.
5. Admits the allegations contained in paragraph 5 of the Motion.
6. Denies the allegations contained in paragraph 6 of the Motion, but admits that

Movant seeks relief.

7. Denies the allegations contained in paragraph 7 of the Motion.

8. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 8 of the Motion.

9. Denies the allegations contained in paragraph 9 of the Motion.

10. Denies the allegations contained in paragraph 10 of the Motion.

11. Denies the allegations contained in paragraph 11 of the Motion.

12. Denies the allegations contained in paragraph 12 of the Motion.

13. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 13 of the Motion.

14. Respondent further avers that Movant is not the holder or servicer of this loan and lacks standing to bring this motion. The assignments attached as an exhibit to the Motion show that the deed of trust was assigned by SunTrust Mortgage, Inc. to Wilmington Savings Fund Society, FSB, as trustee for PrimeStar H Fund I Trust on April 17, 2013. The Motion is brought by BSI Financial Services as alleged agent for Wilmington Savings Fund Society, FSB, as trustee for Brougham Fund I Trust. There is no evidence that the Movant has any interest in the loan or deed of trust that are attached as exhibits to the motion.

WHEREFORE, the Debtor respectfully requests that this Court enter an order denying the Motion.

Dated: February 23, 2018

/s/ James C. Olson.
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06360

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this February 23, 2018, a copy of the foregoing Opposition to Motion for Relief from Automatic Stay was served electronically to those parties on the court's CM/ECF notice list as follows:

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/s/ James C. Olson
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